Nevada Bar No. 11405

LADAH LAW FIRM

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517 S. Third Street

Las Vegas, NV 89101

litigation@ladahlaw.com 4

T: 702.252.0055

F: 702.248.0055

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD CARPENTER, JR., an individual;

Plaintiff,

VS.

GORDON DENNY, an individual; PV HOLDING CORP. dba AVIS CAR RENTAL, a foreign corporation; CANONICAL GROUP LIMITED, a foreign corporation; DOES I through V, inclusive and **ROE** CORPORATIONS II through V, inclusive; Defendants.

ALLSTATE INSURANCE COMPANY,

Intervenor.

CASE NO.: 2:23-CV-00208-RFB-NJK

STIPULATION AND ORDER TO EXTEND JOINT PRETRIAL ORDER **DEADLINE (SECOND REQUEST)**

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff, Defendants Gordon Denny and PV Holding Corp and Intervenor Allstate Insurance Company hereby STIPULATE to extend the time for the parties to file their Joint Pretrial Order as set forth in the Court's Minute Oder dated October 30, 2024 (ECF No. 58) by 30 days. The current deadline for said disclosure is December 2, 2024. This is the second stipulation seeking to extend the subject deadline. This extension would give the parties until January 2, 2025 (taking into consideration the New Years Day holiday which falls on the 30th day).

The parties submit that good cause exists for the requested extension. The parties are continuing their efforts in drafting exhibit lists and culling down the extensive exhibits in this matter for trial. Moreover, the parties recently attended private mediation on October 17, 2024. Defendant

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2	has requested additional time to fully evaluate and consider various issues that were raised during the	
3	mediation, in hopes of potentially reaching a settlement agreement.	
4	The parties further submit that this extension is requested in good faith and with no dilatory	
5	motive.	
6	IT IS HEREBY STIPULATED by all parties, by and through their undersigned counsel, that	
7	the deadline for the parties to submit their Joint Pretrial Order be extended to January 2, 2025.	
8	Respectfully submitted,	
9	DATED this 2 nd day of December, 2024.	DATED this 2 nd day of December, 2024.
10	LADAH LAW FIRM	PYATT SILVESTRI
11 12	/s/ Ramzy P. Ladah	/s/ Robert P. Molina
13 14	RAMZY P. LADAH, ESQ. Nevada Bar No. 11405 517 S. Third Street	ROBERT P. MOLINA, ESQ. Nevada Bar No. 6422 7670 West Lake Mead Boulevard, Suite 250
15 16	Las Vegas, NV 89101 Attorneys for Plaintiff	Las Vegas, NV 89128 Attorneys for Defendants Gordon Denny and PV Holding Corp.
17	DATED this 2 nd day of December, 2024.	
18	RESNICK & LOUIS, P.C.	
19	/s/ Gary R. Guelker	
20	GARY R. GUELKER, ESQ.	
21	Nevada Bar No. 10603	
22	8925 W. Russell Rd., Suite 220 Las Vegas, NV 89148	
23	Attorneys for Intervenor Allstate Insurance Company	
24		
25		
26	///	

IT IS SO ORDERED.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE

Dated: December 3, 2024.

LADAH LAW FIRM